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May 21, 2018

Mr. Stephen Healy
EPA OTAQ Compliance Division
(sent via email to healy.Stephen@epa.gov)

RE: Notification of Small Business Exemption for Glider Vehicle Assembler

Mr. Healy

Empire Truck Sales qualifies as a small business for NAICS Code 336120 and therefore is excluded from the greenhouse gas standards of §§ 1037.105 and 1037.106 for 2018. Empire is wholly owned by G&S Holdings, LLC which is owned by Gerald S. Swanson (25%), Gerald S. Swanson, Jr. (25%) and Jason S Greener (50%). Stribling Equipment, LLC is a commonly owned affiliate company.

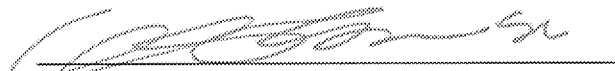
Empire qualifies as a small business and currently has 324 employees. For the past three years Empire has averaged 318 (2017), 316 (2016), and 286 (2015) employees. Total average employee for both companies' combined is 672 today and has averaged 629 since 2015.


The number of gliders that Empire has built is detailed below for year 2010 through 2015:

2010	
2011	
2012	
2013	
2014	
2015	

Please accept this as our notification for 2018.

Sincerely


Gerald S. Swanson


Gerald S. Swanson, Jr


Jason S. Greener